

State Water Resources Control Board

March 30, 2016

(Via email and Certified Mail)
CERTIFIED MAIL
NO. 7015 1520 0001 8019 5845

Mr. Collins Kalu
Manager, Corporate Safety
Los Angeles County Metropolitan
Transportation Authority
One Gateway Plaza
Los Angeles, California 90012
kaluc@metro.net

**SUBJECT: NOTICE OF VIOLATION; UNDERGROUND STORAGE TANK SYSTEMS
LOCATED AT METRO DIVISION 18, 450 WEST GRIFFITH STREET, GARDENA**

Dear Mr. Kalu:

As part of an initiative by the State Water Resources Control Board (State Water Board) to ensure compliance at government-owned and/or operated underground storage tank (UST) facilities in California, the State Water Board staff inspected the USTs at your facility on March 24, 2016, pursuant to authority under Health and Safety Code (H&SC), chapter 6.7, section 25289.

The State Water Board has identified the following violations pursuant to H&SC, chapter 6.7, and title 23, California Code of Regulations (CCR), chapter 16:

No.	Violation	Tank	Start Date	Stop Date	Regulation
1	Failure to Maintain Plot Plan / Site Map – The site map needs to be updated; a tank that has been removed is still on the map.	All	March 24, 2016	Ongoing	H&SC 28286(a); 23 CCR 2711(a)(8)
2	Failure to Maintain Monitoring Plan – Safe suction piping requires a method that confirms it is safe suction. Update the monitoring plan to indicate conventional suction piping.	15 and 16	March 24, 2016	Ongoing	H&SC 25286(a); 23 CCR 2632(d)(1)
3	Failure to Maintain UST Monitoring System – The light bulbs on the monitoring panel were not functioning.	All	March 24, 2016	Ongoing	23 CCR 2630(d)
4	Failure to Monitor Product Piping – The sensor in the piping sump was unable to detect a leak at the earliest opportunity because it was on the wrong side of the sump, not directly below the product line.	17	March 24, 2016	Ongoing	23 CCR 2630(d)

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No.	Violation	Tank	Start Date	Stop Date	Regulation
5	Failure to Tag Monitoring Equipment – The automatic tank gauges were not tagged.	17, 21, 23, and 25	March 24, 2016	Ongoing	23 CCR 2638(f)
6	Failure to Install Line Leak Detectors – Pneumatic pumps have pressurized underground piping without line leak detectors.	18, 19, 20, and 23	March 24, 2016	Ongoing	H&SC 25291(f); 23 CCR 2636(f)(2)
7	Failure to Monitor Product Piping – The sensors in the transition sumps near Tank 23 and in the boiler room were raised.	Transition Sump 1 and 2	March 24, 2016	Ongoing	23 CCR 2630(d)
8	Failure to Install Primary Piping – The primary piping installed in the transition sump near Tank 23 does not appear to be compatible with the product stored.	Transition Sump 2	March 24, 2016	Ongoing	H&SC 25291(a)(1)
9	Failure to Maintain Secondary Containment – The failed components listed on the February 15-17, 2015 Secondary Containment Test have not been repaired or retested.	All	February 17, 2015	Ongoing	H&SC 25291(a)(2)
10	Failure to Perform DO Inspections – Designated Operator monthly visual inspections from November and December 2015, and January and February 2016 were not available at the time of the inspection.	All	March 24, 2016	Ongoing	23 CCR 2715(c)

Comments:

- 1) Any individual performing the work of a service technician must be trained and certified by the manufacturer of the equipment. This includes moving sensors in sumps.
- 2) The hydrostatic reservoir for the transition sump near Tank 23 is not in communication with the double-walled sump and monometer.

You are directed to correct the ongoing violations and submit compliance documentation to the State Water Board and the Los Angeles County Department of Public Works within sixty (60) days from the date of this letter. Have your Designated Operator make specific notations in the next monthly designated operator report indicating the ongoing violations have been corrected. The monthly designated operator report and any associated photos must be submitted as proof of compliance.

Please send all compliance documentation to the following:

State Water Board

Ms. Rebecca Green
UST Enforcement Unit
Office of Enforcement
State Water Resources Control Board
1001 I Street, 19th Floor
Sacramento, California 95814
rebecca.green@waterboards.ca.gov

Local CUPA

Mr. Luke Mitchell
Associate Civil Engineer
Los Angeles County
Department of Public Works
900 S. Fremont Avenue
Alhambra, California 91803
lmitchell@dpw.lacounty.gov

Pursuant to Health and Safety Code, chapter 6.7, section 25299, the owner and operator of the tank(s) are liable for a penalty of \$500 to \$5,000 per tank, per day of violation. These penalties will continue to accrue until the violations have been corrected.

If you have any questions, please contact me at (916) 341-5551, or by email at amantha.henkel@waterboards.ca.gov.

Sincerely,



Amantha Henkel
Senior Environmental Scientist
UST Enforcement Unit
Office of Enforcement

cc: *(via email only)*

Mr. Tim Smith
Civil Engineer
Los Angeles County
Department of Public Works
tsmith@dpw.lacounty.gov

Mr. Luke Mitchell
Associate Civil Engineer
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Mr. James Jimenez
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